

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALLIANZ GLOBAL CORPORATE &
SPECIALTY, N.A. formerly known as, ALLIANZ
INSURANCE COMPANY, AS SUBROGEE OF
DAIMLER CHRYSLER SERVICES NA

Index No. 08 Civ. 563 (DC)

Plaintiff,

-against-

DOUGLAS L. SACKS,

Defendant.

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JOINT MOTION TO BE
TEMPORARILY EXCUSED
FROM THE REQUIREMENTS
OF RULE 26(f)

The parties, ALLIANZ GLOBAL CORPORATE & SPECIALTY, N.A. (Allianz), and DOUGLAS L.SACKS (Sacks), through undersigned counsel, hereby jointly move the Court for temporary relief from the requirements of Rule 26(f) of the *Federal Rules of Civil Procedure*. In support of this motion, undersigned counsel would show the following:

1. Undersigned counsel for the parties arranged a Rule 26(f) scheduling conference to be held on the morning of April 30, 2008.

2. The undersigned counsel conversed telephonically on the morning of April 30, 2008, but, unfortunately, at this time it appears that counsel for Sacks may not, in fact, be counsel of record for Sacks through the remainder of these proceedings.

3. Both undersigned counsel agreed that it would not be fruitful to proceed with the Rule 26(f) conference until the issue of representation was resolved, because counsel for Sacks did not want to bind Sacks to the matters to be discussed and agreed to pursuant to Rule 26(f).

4. Undersigned counsel agreed to request permission of the Court for temporary relief from Rule 26(f) and to give Sacks until May 23, 2008 – the date of the pretrial conference -- to resolve the issue of his representation in these proceedings.

WHEREFORE the parties respectfully jointly move the Court for temporary relief from the requirements of Rule 26(f) of the *Federal Rules of Civil Procedure* at least up and until the time of the pretrial conference on May 23, 2008.

Dated: New York, New York
May 6, 2008

/s/ Michael B. Buckley
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SO ORDERED:

Hon. Denny Chin, U.S.D.J.

Date: May ___, 2008